

1 Stuart D. Kirchick, Attorney (#144145)
2 Law Offices of Stuart D. Kirchick
2 2131 The Alameda, Suite C-1
3 San Jose, California 95126
3 Telephone Number: (408) 291-0123
4 Facsimile Number: (408) 291-0418
4 E-Mail Address: sdkirchick@aol.com

5 Attorney for Plaintiff, FREDERICK BATES

6 RICHARD DOYLE, City Attorney (#88625)
7 NORA FRIMANN, Chief Trial Attorney (#93249)
MICHAEL J. DODSON, Sr. Deputy City Attorney (#159743)
Office of the City Attorney
8 200 East Santa Clara Street
San José, California 95113-1905
9 Telephone Number: (408) 535-1900
Facsimile Number: (408) 998-3131
10 E-Mail Address: cao.main@sanjoseca.gov

11 Attorneys for Defendants, CITY OF SAN JOSE,
12 ROBERT DAVIS, ADONNA AMOROSO and TUCK
YOUNIS

E-FILED - 10/11/07

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

FREDRICK BATES,

Plaintiff,

v.

Case Number: C-06-05302 RMW

STIPULATION TO MODIFY ORDER FOLLOWING CASE MANAGEMENT CONFERENCE

CITY OF SAN JOSE, ROBERT DAVIS,
individually and in his official capacity as
City of San Jose Chief of Police,
ADONNA AMOROSO, individually and in
her official capacity as City of San Jose
Deputy Chief of Police, TUCK YOUNIS,
individually and in his official capacity as
City of San Jose Police Captain.

Defendants.

25 **IT IS HEREBY STIPULATED** by and between the parties hereto through their
26 respective attorneys of record, that the Court's Order following Case Management
27 Conference filed on February 6, 2007 shall be modified in the following respects:

1. Fact discovery shall close on September 28, 2007.

- 1 2. All parties shall disclose experts with reports no later than September 4, 2007.
- 2 3. Expert discovery shall close on September 18, 2007.
- 3 4. The final date for hearing any dispositive motions shall be November 9, 2007 at
4 9:00 a.m. in Courtroom #6.
- 5 5. The Joint Pre-trial Conference Statement shall be filed no later than
6 November 30, 2007.
- 7 6. The Final Pre-trial Conference shall be held on December 6, 2007 at 2:00 p.m.
8 in Courtroom #6.
- 9 7. Jury Trial shall commence on December 10, 2007 at 1:30 p.m. in Courtroom #6.

10 Dated: August 2, 2007

Respectfully submitted,

12 /S/

13 STUART D. KIRCHICK
14 Attorney

15 Attorneys for Plaintiff, FREDERICK BATES

17 Dated: August 2, 2007

Respectfully submitted,

18 RICHARD DOYLE, City Attorney

20 By: /S/

21 MICHAEL J. DODSON
22 Sr. Deputy City Attorney

23 Attorneys for Defendants, CITY OF SAN
24 JOSE, ROBERT DAVIS, ADONNA
25 AMOROSO, and TUCK YOUNIS

26 **IT IS SO ORDERED.**

27 Dated: 10/11/07



HONORABLE RONALD M. WHYTE
United States District Court Judge